

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	CASE NO. 22-50946-MMP
	§	
LISA MARIE GARZA	§	
	§	
DEBTOR	§	CHAPTER 7 CASE

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**APPLICATION OF ATLAS CONSUMER LAW, A DIVISION OF SULAIMAN LAW,  
LTD, FOR APPROVAL OF ATTORNEYS' FEES AND EXPENSES  
AS SPECIAL COUNSEL TO THE TRUSTEE FOR THE PERIOD BEGINNING  
FEBRUARY 21, 2022 AND ENDING MARCH 10, 2023**

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**This pleading requests relief which may be adverse to your interests.**

**If no timely response is filed within twenty-one (21) days from the date of service, the relief requested herein may be granted without a hearing being held.**

**A timely filed response is necessary for a hearing to be held.**

TO THE HONORABLE MICHAEL M. PARKER,  
UNITED STATES BANKRUPTCY JUDGE:

NOW COMES Atlas Consumer Law, a Division of Sulaiman Law Group, Ltd, (herein "Atlas") bringing this Application of t Atlas Consumer Law, a Division of Sulaiman Law, Ltd, for Approval of Attorneys' Fees and Expenses as Special Counsel to the Trustee for the period beginning February 21, 2022 and ending March 10, 2023, and in support thereof states:

1. On or around August 27, 2022, Lisa Marie Garza ("Debtor") filed a voluntary petition for relief pursuant to Chapter 7 of the United States Bankruptcy Code.
2. Atlas acted as special counsel to the Chapter 7 Trustee.
3. Before and during the pendency of the Bankruptcy, Atlas was employed by the Debtor and then the Trustee to represent the Debtor/Estate in the in an arbitration case captioned as *Lisa M. Garza v. National Debt Relief, LLC*, case no. 01-22-0000-7402 filed with the American

Arbitration Association. In conjunction with this representation Atlas incurred the following attorney fees and expenses, as more particularly set forth in chronological format in the “Statement” attached as Exhibit “A” and incorporated by this reference:

Attorney Fees:	\$16,760.00
Expenses:	\$1,489.40
<b>Total Attorney Fees and Expenses:</b>	<b>\$18,249.35</b>

4. The time spent and hourly rate of the attorney during the Application Period was as follows:

	<u>Hourly Rate</u>	<u>Hours</u>
Nathan C. Volheim – Attorney	\$ 575.00	16.8
Eric D. Coleman - Attorney	\$ 475.00	23.8
Kiran Wadia – Paralegal	\$195.00	4.3

<b>TOTAL:</b>	<b>\$16,760.00</b>
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5. The detail for the above fee amounts are detailed in the attached Exhibit “A”, which is attached.

6. Accordingly, Atlas seeks compensation in the amount of \$16,760.00 for all professional time and \$1,489.40 in taxable costs.

7. Various factors have been suggested by Courts in considering the value of compensation rendered in awarding compensation in a bankruptcy case. *In re First Colonial Corporation*, 544 F.2d 1291 (5<sup>th</sup> Cir.,1977). These factors are relevant to this Application, and are set out and discussed separately below:

- a. Time and Labor Required. Applicant devoted reasonable and necessary time to his representation of the Trustee as shown on Exhibit “A.” The

principal task was to serve as counsel in all matters related Debtor's case against National Debt Relief, LLC. The purpose of the arbitration was to prosecute the Debtor claims under the Credit Repair Organization Act and Texas Credit Services Organizations Act.

- b. Novelty and Difficulty of the Questions. The case did not present any novel legal questions. The case did present straightforward facts and the Credit Repair Organization Act and Texas Credit Services Organizations Act provided the applicable remedies for the Debtor.
- a. Skills Requisite to Perform the Service Properly. Atlas Consumer Law A Division of Sulaiman Law, Ltd. is a very known consumer litigation law firm in the United States and has filed thousands of lawsuits related to various consumer statutes across the United States.
- b. Customary Fees. The charges by Applicant are believed to be at a rate comparable to those charged by attorneys having the same or similar expertise representing trustees and creditors in insolvency cases in the locale.
- c. Whether Fee is Fixed or Contingent. The fixed fees of the Applicant are subject to the review, approval and/or discretion of the Court in determining allowance and payment. The fees were not contingent upon the outcome.
- d. Time Limitations. The case did not present unusual time demands other than the usual and necessary time needed to pursue final judgment.
- e. Amount Involved and Results Obtained. The Parties reached a Settlement Agreement.

- f. The Undesirability of the Case. This is not a factor in this case.
- g. The Nature and Length of Professional Relationship. Atlas Consumer Law A Division of Sulaiman Law, Ltd. has been representing Debtor since February 14, 2022.
- h. Awards in Similar Cases. From information and believe the compensation sought is consistent with reasonable compensation awarded in other consumer cases. Applicant does not seek any special fee, bonus, or accentuated rate.
- i. Fees and Expenses. Expenses in this case are nominal and are primarily related to the prosecuting of this case.
- j. Mileage. There are no charges for mileage since the charges were de minimis.
- k. Travel. The representation did not require travel.
- l. Itemized Entries. Attached hereto as Exhibit “A” is a chronological record reflecting time spent by attorneys and descriptions of the services performed on behalf of Atlas.

- 13. This fee application is filed and submitted in accordance with the requirements of the Court and the Bankruptcy Code.
- 14. The required Fee Application Summary is attached as Exhibit “B”.
- 15. A proposed form of Order is attached as Exhibit “C.”

FOR THESE REASONS the Applicant requests that the First and Final Fee Application be approved and that the Trustee be authorized to pay the Applicant from available funds in the estate. Applicant requests such other and further relief to which it may show itself justly entitled.

Dated: March 21, 2023

Respectfully submitted,

/s/ Nathan C. Volheim

Nathan C. Volheim

SBN:

Sulaiman Law Group, Ltd.

2500 South Highland Avenue,

Suite 200

Lombard, IL 60148

Phone: (630) 575-8181

Fax: (630) 575-8188

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### CERTIFICATE OF SERVICE

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I hereby certify that on the 21<sup>st</sup> day of March, 2023, a true and correct copy of the foregoing document, along with a copy of the Proposed Order was filed with the Court either served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system or by First Class United States Mail to the parties as set forth in the attached mailing matrix and to the following parties:

Lisa Marie Garza 9423 Valley Dale Street San Antonio, TX 78250 <b>Debtor/Plaintiff</b>		Nicholas C. Inman Allmand Law Firm, PLLC 860 Airport Fwy, Ste 401 Hurst, TX 76054 <b>Attorney for Debtor</b>
Robby H. Birnbaum, Esq. Greenspoon Marder LLP 2255 Glades Road, Ste. 400-E Boca Raton, FL 33431 <b>Counsel for National Debt Relief, LLC</b>		U.S. Trustee 615 E. Houston, Ste. 533 San Antonio, TX 78205
Jose C. Rodriguez Chapter 7 Trustee		

1101 W. 34 <sup>th</sup> Street, #223 Austin, TX 7870		
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*/s/ Nathan C. Volheim*

Label Matrix for local noticing  
0542-5  
Case 22-50946-mmmp  
Western District of Texas  
San Antonio  
Wed Feb 1 10:33:15 CST 2023

Attorney General of Texas  
Bankruptcy Collection Division  
PO Box 12017  
Austin, TX 78711-2017

(p)LINEBARGER GOGGAN BLAIR & SAMPSON LLP  
ATTN DON STECKER  
112 E PECAN  
SUITE 2200  
SAN ANTONIO TX 78205-1588

Christus Santa Rosa Children's Hospital  
PO Box 847053  
Dallas, TX 75284-7053

Internal Revenue Service  
Centralized Insolvency Operations  
PO Box 7346  
Philadelphia, PA 19101-7346

Lisa Marie Garza  
9423 Valley Dale  
San Antonio, TX 78250-3901

NTTA  
PO Box 660244  
Dallas, TX 75266-0244

Smile Direct Club HQ  
414 Union St 8th Fl  
Nashville, TN 37219-1929

United States Attorney - Western  
601 NW Loop 410 Suite 600  
San Antonio, TX 78216-5597

Victoria Emergency Partners LLC  
PO Box 203949  
Dallas, TX 75320-3949

U.S. BANKRUPTCY COURT  
615 E. HOUSTON STREET, ROOM 597  
SAN ANTONIO, TX 78205-2055

Bank of America  
Bankruptcy  
PO Box 660710  
Dallas, TX 75266-0710

Bexar County Tax Assessor-Collector  
PO Box 839950  
San Antonio, TX 78283-3950

Couch Lambert  
3501 N Causeway Blvd Suite 800  
Metairie, LA 70002-3625

LVNV Funding, LLC  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Mariner Finance  
Attn: Bankruptcy 8211 Town Center Drive  
Nottingham, MD 21236-5904

Resurgent Capital Services  
Attn: Bankruptcy  
PO Box 10497  
Greenville, SC 29603-0497

Texas Alcoholic Beverage Comm  
Licenses and Permits Division  
PO Box 13127  
Austin, TX 78711-3127

United States Trustee - SA12  
US Trustee's Office  
615 E Houston, Suite 533  
San Antonio, TX 78295-1601

Jose C Rodriguez  
Jose C. Rodriguez, Trustee  
1101 W. 34th Street, #223  
Austin, TX 78705-1907

(p)ALLMAND LAW FIRM  
860 AIRPORT FREEWAY  
401  
HURST TX 76054-3264

(p)BARRETT DAFFIN FRAPPIER TURNER & ENGEL LL  
4004 BELT LINE ROAD SUITE 100  
ADDISON TX 75001-4320

Cedar Hill National Bank  
C/O CATO  
PO Box 37902  
Charlotte, NC 28237-7902

Great Northwest Community Improvement Associ  
8809 Timberwilde St  
San Antonio, TX 78250-4331

Linebarger Goggan Blair & Sampson LLP  
Attn: Lisa Large Evans  
2777 N. Stemmons Freeway, Ste 1000  
Dallas, TX 75207-2328

Methodist Specialty & Redacted Hosp  
Resurgent Capital Services  
PO Box 1927  
Greenville, SC 29602-1927

(p)SECURITY SERVICE FEDERAL CREDIT UNION  
ATTN ATTN PATRICK RYAN  
15000 IH 10 WEST  
SAN ANTONIO TX 78249-3531

US Attorney General  
US Department of Justice  
950 Pennsylvania Ave, NW  
Washington, DC 20530-0009

United States Trustee - Western  
615 E. Houston Street, Suite 533  
San Antonio, TX 78205-2055

Nicholas C Inman  
Allmand Law  
860 Airport Freeway, Ste 401  
Hurst, TX 76054-3264

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Allmand Law Firm, PLLC  
Allmand Law Firm, PLLC  
860 Airport Fwy Ste 401  
Hurst, TX 76054-3264

Bank of America, N.A.  
c/o BDFTE LLP  
4004 Belt Line Rd, Ste 100  
Addison, TX 75001

Bexar County  
c/o Don Stecker  
112 E. Pecan Street, Suite 2200  
San Antonio, TX 78205

Security Service FCU  
Attn: Bankruptcy  
P.O. Box 691510  
San Antonio, TX 78269

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Lisa Marie Garza  
9423 Valley Dale  
San Antonio, TX 78250-3901

End of Label Matrix	
Mailable recipients	29
Bypassed recipients	1
Total	30